McCulloch Kleinman

INTELLECTUAL PROPERTY ATTORNEYS

October 5, 2021

VIA ECF

Hon. J. Paul Oetken United States District Court Southern District of New York 40 Foley Square, Room 2204 New York, NY 10007

Re: Pablo Star Ltd., et al. v. The Welsh Government, et al., No. 15-cv-1167 (JPO)

Dear Judge Oetken,

This firm is counsel for Plaintiffs Pablo Star Ltd. and Pablo Star Media Ltd. ("Plaintiffs"). On September 3, 2021, the parties filed a status report advising the Court that they had reached a tentative settlement agreement that would resolve all claims in this action. (Dkt. No. 167.) The Court subsequently entered an order dated September 7, 2021 dismissing this action without costs and without prejudice to restoring to the Courts calendar, provided the application to restore is made within thirty days or October 7. (Dkt. No. 168.)

Plaintiffs, by and through undersigned counsel, hereby request that the Court extend the reinstatement deadline to October 28, 2021. The requested extension is necessary to give the parties additional time to finalize their written agreement and execute terms required thereunder, which have been delayed due to difficulties associated with working with a foreign government.

This is the first request for an extension of time related to this deadline.

Respectfully submitted,

Kevin McCulloch, Esq. 501 Fifth Avenue, Suite 1809 New York, NY 10017

T: (212) 355-6050 kevin@mkiplaw.com